

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**IN RE: ZOFRAN® (ONDANSETRON)  
PRODUCTS LIABILITY LITIGATION**

Karla Rodriguez and Edward Rodriguez,  
Individually and as Parents and Natural Guardians of  
M.R., a Minor,

Plaintiffs,

v. GlaxoSmithKline LLC,

Defendant.

MDL no. 1:15-md-2657-FDS

This document relates to:

Case No. 1:15-cv-13762

ORAL ARGUMENT  
REQUESTED

**GLAXOSMITHKLINE LLC'S  
MOTION TO EXCLUDE THE SPECIFIC CAUSATION TESTIMONY OF RA-ID  
ABDULLA, M.D. UNDER FEDERAL RULE OF EVIDENCE 702**

GlaxoSmithKline LLC ("GSK") moves to exclude the specific causation testimony of Ra-id Abdulla, M.D. under Federal Rule of Evidence 702 and *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S. 579, 586 (1993). GSK contemporaneously submits its Memorandum in Support of this Motion.

**REQUEST FOR HEARING**

GSK hereby requests oral argument on all matters raised in its Motion to Exclude, as well as all matters raised in any opposition thereto submitted by Plaintiffs.

DATED: June 28, 2019

Respectfully submitted,

/s/Thomas Sheehan

Thomas Sheehan  
Eva Canaan  
PHILLIPS LYTLE L.L.P.  
One Canalside  
125 Main Street  
Buffalo, NY 14203-2887  
[tsheehan@phillipslytle.com](mailto:tsheehan@phillipslytle.com)  
[ecanaan@phillipslytle.com](mailto:ecanaan@phillipslytle.com)

Madeleine M. McDonough  
Jennifer M. Stevenson  
Jennifer Stonecipher Hill  
SHOOK, HARDY & BACON L.L.P.  
2555 Grand Blvd.  
Kansas City, MO 64108  
Telephone: (816) 474-6550  
Facsimile: (816) 421-5547  
[mmcdonough@shb.com](mailto:mmcdonough@shb.com)  
[jstevenson@shb.com](mailto:jstevenson@shb.com)  
[jshill@shb.com](mailto:jshill@shb.com)  
*Admitted pro hac vice*

Attorneys for Defendant GlaxoSmithKline LLC

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document, which was filed with the Court through the CM/ECF system, will be sent electronically to all registered participants as identified on the Notice of Electronic Filing (“NEF”) and paper copies will be sent via first class mail to those identified as non-registered participants.

/s/ Jennifer Stonecipher Hill  
Jennifer Stonecipher Hill